

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CAUSE NO. A-20-CR-103(1) RP
	§	
	§	
JOHAN SHAREEF AL-SUHAIL	§	

**UNOPPOSED MOTION TO PERMIT DEFENDANT TEMPORARY ACCESS TO
PASSPORT IN CUSTODY OF US PRETRIAL SERVICES**

TO THE HONORABLE ROBERT PITMAN, UNITED STATES DISTRICT JUDGE,
FOR THE WESTERN DISTRICT OF TEXAS, AUSTIN DIVISION:

COMES NOW Defendant Johan Shareef Al-Suhail, by and through her undersigned counsel, and moves this Court to permit Defendant's temporary access to his passport, showing the Court as follows:

I.

The Defendant, Johan Al-Suhail, awaits sentencing after entering a guilty plea to making a false statement, in violation of 18 USC 1001.

II.

A month ago, Mr. Al-Suhail, misplaced his Texas Driver's License. Mr. Al-Suhail has been unable to locate the Driver's License and needs to replace it. The Texas Department of Public Safety requires that Mr. Al-Suhail show his passport to provide proof of his identity in order to replace his lost driver's license.

III.

US Pretrial Services has retained custody of Mr. Al-Suhail's passport as a condition of release. US Pretrial Services Officer Albert Sierra advised counsel that a court order will be necessary to allow Mr. Al-Suhail to access his passport.

IV.

Mr. Al-Suhail therefore requests the Court to authorize US Pretrial Services to grant him temporary access to his passport as necessary to allow him to apply for a replacement Texas Driver's license.

V.

The government has been consulted and does not oppose the Court granting this motion. U.S. Pretrial Officer Albert Sierra, who has been supervising Mr. Al-Suhail, has been consulted.

FOR THESE REASONS, Defendant requests permission for temporary access to his passport.

Respectfully submitted.

MAUREEN SCOTT FRANCO
Federal Public Defender

/s/ JOSE I. GONZALEZ-FALLA
Assistant Federal Public Defender
Western District of Texas
Lavaca Plaza
504 Lavaca St., Ste. 960
Austin, Texas 78701
(512) 916-5025
(512) 916-5035 (FAX)
Bar Number: Texas 08135700

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of October, 2020, I electronically filed the foregoing Defendant's Unopposed Motion To Permit Defendant Temporary Access to Passport In Custody of US Pretrial Services with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Michael C. Galdo
G. Karthik Srinivasan
Assistant U.S. Attorney
903 San Jacinto Blvd., Suite 334
Austin, TX 78701

/s/Jose I. Gonzalez-Falla

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V.

JOHAN SHAREEF AL-SUHAIL

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ORDER

On this date came on to be considered the Defendant's Unopposed Motion to Permit Defendant Temporary Access to Passport in Custody of US Pretrial Services. After considering same the Court finds the motion should be Granted/Denied.

It is hereby Ordered that US Pretrial Services shall permit Mr. Al-Sahail to have temporary access to his passport for the purpose of applying for a new drivers license. Mr. Al-Suhail is to return the passport to US Pretrial Services upon completing his application for the driver's license. The Court leaves at the discretion of US Pretrial Services how and when Mr. Al-Suhail is to receive and return the passport.

SIGNED THIS _____ DAY OF _____, 2020.

ROBERT PITMAN
UNITED STATES DISTRICT JUDGE